

EXHIBIT 76
REDACTED

MAO DECLARATION
OPPOSITION TO SUMMARY
JUDGMENT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RODRIGUEZ, JULIEANNA)
ELIZA CAMBAY, SAL) Case No.:
, EMIR GOENAGA, JULIAN) 3:20-cv-04688
, HAROLD NYANJOM, KELLIE)
, and SUSAN LYNN HARVEY,)
ually and on behalf of all)
similarly situated,)
Plaintiffs,)
.)
LLC,)
Defendant.)
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HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

REMOTE PROCEEDINGS OF THE
VIDEOTAPED DEPOSITION OF STEVE GANEM
FRIDAY, OCTOBER 28, 2022

20 REPORTED BY NANCY J. MARTIN
21 CSR. NO. 9504, RMR, RPR
22 CLAUDIA R. GARCIA, CSR. 12812
23 JOB No. 5554575
24
25 PAGES 1-325

1 Q Got it. Can you go on to the next page.

2 MR. SANTACANA: The end of that answer cut out
3 for me. I don't know if cut out for you, Claudia.

4 THE WITNESS: It could be inserted into the
5 logs if it passed those consent checks. 06:33:14

6 BY MR. MAO:

7 Q Mr. Ganem, if you go on to the next page, do
8 you see that diagram there on the bottom left of logs?
9 It talks about 13 log sources and types, three
10 protocols. 06:33:44

11 Do you see that there?

12 A Yes.

13 Q Do you know what those are, the 13 logs and
14 three protocols?

15 MR. SANTACANA: Which page, Mark? 06:34:00

16 MR. MAO: This would be 14, which is Bates
17 446.

18 MR. SANTACANA: Thanks.

19 MR. MAO: It's the little gray cylinder on the
20 bottom left of that diagram. You probably have to 06:34:20
21 expand it, Eduardo.

22 MR. SANTACANA: I got it. Thank you.

23 MR. MAO: Really hard to read it.

24 THE WITNESS: So I believe the three protocols
25 are detailed right below the statement three protocols. 06:34:29

1 BY MR. MAO:

2 Q Are those proto buffers, by the way, or are
3 those protocols, or is that like somehow different than
4 proto buffers?

5 A They are related. But I'm not sure if they 06:34:42
6 are the same.

7 Q Okay. I presume that you can't enumerate the
8 13 logs off the top of your head; right?

9 A I can't. Though I think earlier we
10 identified, I believe, six for apps. And we hadn't 06:35:02
11 discussed Google Analytics for the web, which I believe
12 has other logs.

13 Q Sorry. Which document did we identify six?

14 A You may recall that earlier, when we went back
15 on the record, we came back to you with more details 06:35:26
16 regarding the logs after speaking to engineers.

17 Q I oh, see. That's what you're referring to.
18 Sorry. I was confused. I thought maybe we were
19 referring to a document that we had just looked at.

20 So can you confirm what those 13 are in terms 06:35:42
21 of the ones that are for -- the ones that are listed
22 there? And I appreciate you telling me which three
23 protocols you're talking about, though.

24 MR. SANTACANA: So it sounds like outside
25 scope as to the other seven, is what he's saying. 06:35:59

1 MR. MAO: Well, he said he thinks. So I want
2 to make sure.

3 BY MR. MAO:

4 Q I mean, you have a very easy way to verify
5 that. It looks to me like the log sources, the 06:36:15
6 details are there under eldar.corp.google.com?

7 MR. SANTACANA: Where? Oh, log, sources,
8 details -- okay. We can try.

9 MR. MAO: I appreciate that.

10 MR. SANTACANA: Thanks for pointing that out. 06:36:32

13 BY MR. MAO:

14 Q Um, if you don't mind going -- turning back a
15 little bit with me to 440, and you're going to have to
16 really expand this here. That will be page 8 of the
17 PDF. I have to magnify that a little bit.

A horizontal bar chart with 10 bars of varying lengths. The bars are black on a white background. The lengths of the bars increase from left to right, with the longest bar being the 9th bar.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 Q And those -- those bundles there appear to me
9 to -- all three bundles, if you look at the last row,
10 all seem to include IDFA/ADID and DSID as in those 06:38:35
11 could actually be -- end up in the same bundle
12 together; is that correct?

13 A IDFA and ADID would never be in the same
14 bundle as each other.

15 Q Could either -- or sorry. 06:38:58
16 Can they though however be in the same bundle
17 as the DSID?

18 A IDFA and DSID would never be in the same
19 bundle as each other. It's possible that ADID and DSID
20 could be in the same bundle together. 06:39:21

21 Q Got it. And that's because on iOS, there is
22 no DSID?

23 A That's correct.

24 Q Are any of these three pseudonymous IDs ever
25 present in Google Takeout data? 06:39:41

1 MR. SANTACANA: Vague and outside scope.

2 THE WITNESS: Can you describe to me what you
3 mean by Google Takeout data?

4 BY MR. MAO:

5 Q Do you know the function Google Takeout? It's 06:40:06
6 a function you can do under My Account, where you can
7 takeout -- my understanding is basically my account
8 data. That's at least my understanding.

9 A I'm not familiar with it.

10 Q Got it. If you go down to 450, which is 06:40:33
11 page 18 of the PDF. My main question there is: Where
12 are UIDs referenced in this chart?

13 A UDI referenced in this chart refers to the
14 user ID feature of Google Analytics.

15 Q Are they present in the -- in the pseudonymous 06:41:43
16 measurement logs?

17 A They can be depending on whether the customer
18 is using that feature.

19 Q Got it. Are they different than PBIDs, the
20 UID? 06:42:32

21 A I'm not familiar with the PPID feature.

22 Q Got it.

23 MR. MAO: I introduced into exhibit a
24 different one which is 224. If you don't mind pulling
25 that up. 06:42:53

1 (Exhibit 224 was marked for
2 identification and is attached
3 hereto.)

4 THE WITNESS: Okay. I have it open.

5 BY MR. MAO: 06:43:32

6 Q My -- my question to you, Mr. Ganem, is do
7 you -- do you know if this was ever launched?

8 A (No audible response.)

9 Q Perhaps, maybe -- maybe -- maybe let me ease
10 this up a little bit. 06:44:09

11 I can't tell, but -- I can't tell if -- is
12 this an earlier design for [REDACTED] or [REDACTED]
13 [REDACTED]?

14 A I honestly have no idea what this is. Never
15 seen it before. Never heard of the phrase, "unified ID 06:44:35
16 linkage design."

17 Q Have you ever heard of [REDACTED], [REDACTED]
18 [REDACTED]?

19 A It sounds familiar, but I don't -- I don't
20 know what that is. 06:44:59

21 Q In -- in terms of the -- in terms of the WAA
22 and SWAA control look up, do you know what process
23 within Google looks that up?

24 MR. SANTACANA: Vague.

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